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Attorneys for Defendant,
BROSNAN RISK CONSULTANTS, LTD.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JILL HARRISON, an Individual,

Plaintiff,

v.

WALMART, INC., a Delaware Corporation,
BROSNAN RISK CONSULTANTS, LTD., a
Delaware Corporation; DOES I-X, Inclusive,
and ROE Corporations I-X, Inclusive,

Defendants.

CASE NO.: 2:24-cv-491-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER
(FIRST REQUEST)**

COMES NOW, JILL HARRISON, (“PLAINTIFF”), Defendant WALMART INC. (hereinafter “WALMART”), and Defendant BROSNAN RISK CONSULTANTS, LTD. (hereinafter “BROSNAN”), by and through their respective counsel, and hereby submit this Stipulation and Order to Extend Discovery Plan and Scheduling Order (First Request) pursuant to LR IA 6-1 and LR 26-3 as follows:

I. PROCEDURAL HISTORY

On March 12, 2024, Plaintiff Jill Harrison filed her Complaint against Defendant Walmart in the United States District Court for Clark County, Nevada. On March 13, 2024 Plaintiff filed her First Amended Complaint. On June 17, 2024, Defendant WALMART, INC. filed its Answer

1 to Plaintiff's First Amended Complaint. On June 17, 2024 Defendant BROSNAN filed its Answer
2 to Plaintiff's First Amended Complaint. Joint Discovery Plan and Scheduling Order was entered
3 by this Court on February 6, 2025.

4 **II. DISCOVERY COMPLETED TO DATE:**

5 The parties have been engaged in discussions to determine if an early resolution was
6 possible and no discovery has been completed to date.

7 **III. DISCOVERY REMAINING TO COMPLETET:**

- 8 1. Initial expert disclosures;
- 9 2. Rebuttal expert disclosures;
- 10 3. Deposition of Plaintiff;
- 11 4. Deposition of Experts;
- 12 5. Deposition of other percipient witnesses; and
- 13 6. Written Discovery as necessary.

14 Good cause exists to continue the current Discovery Plan and Scheduling Order. The
15 parties are diligently working to move the case forward but due to the recent stipulation to allow
16 WALMART to assert counterclaims against BROSNAN and initial efforts to resolve this matter
17 prior to incurring litigation expenses, the Parties request that the deadlines be continued to allow
18 them to engage in necessary discovery while also continuing discussions regarding a potential
19 resolution of this claim..

20 Therefore, the Parties have agreed to a sixty (60) day extension to allow the Parties to
21 complete the necessary discovery. Specifically, the Parties believe this extension is necessary
22 because the parties will need to schedule the remaining depositions, including Plaintiff's
23 deposition, conduct expert discovery, and serve additional written discovery.

24 No trial has been set on this matter and neither party will be prejudiced by the requested
25 extension.

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27 ///

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EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to Amend Pleadings	March 23, 2025	May 12, 2025
Initial Expert Disclosures	March 23, 2025	May 12, 2025
Rebuttal Expert Disclosures	April 24, 2025	June 23, 2025
Close of Discovery	June 20, 2025	August 19, 2025
Dispositive Motions	July 22, 2025	September 22, 2025

No trial date will be impacted by the extension as no such trial date has been set. The parties submit that the reason set forth above constitute good cause for the requested extension.

IT IS SO STIPULATED.

DATED: March 21, 2025

SKANE MILLS LLP

/s/ Elizabeth C. Spaur

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Attorneys for Defendant,

BROSNAN RISK CONSULTANTS, LTD.

DATED: March 21, 2025

RYAN ALEXANDER, ESQ.

/s/ Ryan Alexander

By:

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Attorneys for PLAINTIFF

1
2 DATED: March 21, 2025

McDONALD CARANO LLP

/s/ Katrina E. Weil

3 By:

4 Rory T. Kay, Esq (Nevada Bar No. 12416)
5 Katrina E. Weil (Nevada Bar No. 16152)
6 2300 West Sahara Avenue, Suite 1200
7 Las Vegas, Nevada 89102

8 Attorneys for Defendant,
9 WALMART, INC.

10 **IT IS SO ORDERED.**

11 Denied without prejudice. The
12 parties please submit an amended
13 stipulation that includes the joint
14 pretrial order deadline along with
15 the language under LR 26-1(b)(5)
16 temporarily suspending the joint
17 pre-trial deadline if dispositive
18 motions are filed. The parties'
19 amended stipulation should also
20 state whether initial disclosures
21 have been exchanged or provide a
22 deadline for such exchange. For
23 various reasons, LR IA 6-2
24 requires the judicial signature
25 block to appear on the same page
26 as the last substantive matter.
27 The parties may submit an
28 amended stipulation in
compliance with LR IA 6-2.



UNITED STATES MAGISTRATE JUDGE
3-28-25